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## REMARKS/ARGUMENTS

## **Claim Rejections**

All claims have been rejected in view of the cited references due to an apparent misunderstanding of the term "manipulation" used in the claims and apparent oversight of the fact that "object images" in an inventive icon represent individual document pages rather than entire documents as shown in the prior art references. The display of elements that represent individual pages enables manipulation or editing of the actual pages within a document rather than simple document manipulation. Accordingly, applicant has amended independent claims 1, and 18 to more distinctly claim these novel elements.

## Rejection under 35 U.S.C. §102

The examiner has rejected claims 1, 3-5, 7-9 and 15 under 35 U.S.C. §102(b) as being anticipated by U.S. Patent Serial No. 5,303,388, by Kreitman et al. Claim 1 has been amended to more particularly point out that selection of an active region will activate a document editing function, which performs editing of a document rather than simple document manipulation. Claims 3-5, 7-9 which are dependent thereon and contain all the limitations of claim 1 are allowable for the reasons pointed out for claim 1.

With respect to claim 15, this rejection fails to present a prima facie case of anticipation because Kreitman et al. do not teach all the elements of claim 13 or claim 15, which is dependent thereon. Kreitman et al., the other cited prior art references and combinations thereof do not teach an icon wherein "each of said object images representing a page in a document ..." as claimed in claim 13. Object elements in cited prior art references represent documents or files, but do not represent editable sub-elements within those files or documents such as pages or image frames. This distinctive difference allows embodiments of the present invention to provide document editing functions, such as page or frame reordering, page or frame deletion, page or frame copying and other functions and hence represents a distinctive, novel and functional difference from the prior art references.

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## Rejections under 35 U.S.C. §103

Claims 2, 10-12, 14, 16 and 17 have been rejected under 35 U.S.C. §103 as being obvious over Kreitman et al. in view of U.S. Patent No. 5, 751,287 by Hahn et al. As stated above, claim 1 has been amended to more particularly point out that selection of an active region will activate a document editing function, which performs editing of a document rather than simple document manipulation. This function is not enabled by any combination of the cited prior art references. Claims 10-12 which are dependent thereon and contain all the limitations of claim 1 are allowable for the reasons pointed out for claim 1.

With respect to claims 14, 16 and 17, this rejection fails to present a prima facie case of obviousness because Kreitman et al., in combination with Hahn or any other cited prior art reference, do not teach all the elements of claim 13 or claims 14, 16 and 17, which are dependent thereon. Kreitman et al., the other cited prior art references and combinations thereof do not teach an icon wherein "each of said object images representing a page in a document ..." as claimed in claim 13. Object elements in cited prior art references represent documents or files, but do not represent editable sub-elements, such as pages or image frames, within those files or documents. This distinctive difference allows embodiments of the present invention to provide document editing functions, such as page or frame reordering, page or frame deletion, page or frame copying and other functions and hence represents a distinctive, novel and functional difference from any combination of the prior art references.

The examiner states that the cited prior art references disclose "a graphical user interface that presents the user with an easy and efficient system for manipulating and organizing *documents* in a computer system," however, the embodiments of the present invention as claimed in claims 1, 13 and dependent claims thereof claim a system that allows manipulation and organization of document *pages* or other sub-elements, such as image frames, within a document. This is enabled by the "document editing function" of claim 1 (as amended) and the individual object images representing *pages* of a document in claim 13.

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Claim 6 has been rejected under 35 U.S.C. §103 as being obvious over Kreitman et al. in view of Microsoft® Windows NT, version 4.0 (Microsoft) © 1981-1999 Microsoft Corp. As stated above, claim 1 has been amended to more particularly point out that selection of an active region will activate a document editing function, which performs editing of a document rather than simple document manipulation. This function is not enabled by any combination of the cited prior art references. Claim 6 which is dependent thereon and contains all the limitations of claim 1 is allowable for the reasons pointed out for claim 1.

Claims 13, 18, 19, 22, 25 and 26 have been rejected under 35 U.S.C. §103 as being obvious over Kreitman et al. in view of U.S. Patent No. 5, 905,992 by Lucas et al. While Lucas et al. disclose the use of adjacent, overlapping, successive elements that represent documents, Lucas et al. do not disclose these overlapping elements that represent individual document sub-elements such as pages or image frames. Claim 13 comprises "object images representing a page in a document." Claim 18 (as amended) comprises "object images being associated with a different selectively displayable page image." Claim 19 comprises "said object images representing a page in a document." Claim 22 is dependent on claim 19 and therefore contains all the limitations of claim 19 rendering it allowable for the same reasons as put forth for claim 19 above. Claims 25 and 26 also comprise the element of "each of said object images representing a page in a document." Accordingly, this rejection is improper for failing to present a prima facie case of obviousness for claims 13, 19, 22, 25 and 26, which comprise this novel and non-obvious element in their original form. Claim 18 has been amended to comprise this element and is therefore allowable in its amended form.

Claims 20, 21, 23 and 24 have been rejected under 35 U.S.C. §103 as being obvious over Kreitman et al. in view of U.S. Patent No. 5, 905,992 by Lucas et al., in further view of U.S. Patent No. 5, 751,287 by Hahn et al. Claims 20, 21, 23 and 24 are dependent on claim 19, comprise all the limitations of claim 19 and are therefore allowable for the reasons stated above with regard to claim 19. In the examiner's rejection of claim 23, the examiner cites Kreitman et al. as disclosing "page images representing a page of said document" (page 10, last line). However, this characterization is incorrect. The examiner cites Kreitman et al. (col. 4, lines 14-

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26) as disclosing this element, but this location in the reference refers to a rotating icon with various faces that display document information. Kreitman et al. do not disclose at any location an icon with elements that represent individual pages of a document. Some prior art references use a single page image on the icon to help identify the content of the document, but no reference relates icon elements to individual pages of a document.

Applicant respectfully requests that the claims, as amended, be allowed in their current condition.

Respectfully submitted,

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